

September 24, 2002

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street S.W., TW-A325 Washington, D.C. 20554

Re: Ex Parte Notice

In the Matter of Amendment to Part 1 of the Commission's Rules – Competitive Bidding Procedures, Order on Reconsideration of the Third Report and Order, Fifth Report and Order, and Fourth Further Notice of Proposed Rulemaking, WT Docket No. 97-82, FCC 00-274

Dear Ms. Dortch:

On Monday, September 23, 2002, Margaret Wiener, Chief of the Auctions and Industry Analysis Division met with staff and members of the National Telecommunications Cooperative Association (NTCA) at NTCA's Fall Conference at the Mirage Resort and Casino in Las Vegas, Nevada. A complete list of people attending the meeting is attached.

During the meeting the group discussed a pending Petition for Reconsideration of the Commission's attribution rules. The group explained that the rules actually work to prevent small telephone cooperatives from participating in the auction process. Officers and directors of the cooperatives are often reluctant to share their financial information, choosing instead not to participate in the auctions. Further, the group told Margaret that officers and directors of telephone cooperatives have no financial stake in the company, thus the attribution rules do not further the Commission's objectives.

In accordance with the Commission's rules, an original and two copies of this letter are being filed with the Secretary's office. If you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

/s/ Jill Canfield
Jill Canfield
Regulatory Counsel

cc: Margaret Wiener

## NTCA Fall Conference Mirage Resort and Casino Las Vegas, Nevada September 23, 2002

## **List of Attendees**

NTCA Staff	
Marie Guillory, Vice President,	Legal and Industry
Dan Mitchell, Sr. Regulatory Counsel	Legal and Industry
Jill Canfield, Regulatory Counsel	Legal and Industry
Scott Reiter, Telecomm. Specialist	Legal and Industry
Rick Schadelbauer, Economist	Legal and Industry
(Via conference call)	
Shirley Bloomfield, Vice President	Assoc. Services and Government Affairs
Bernie Arnason, Vice President	Business and Technology
Athena Platis, Wireless Industry Analyst	Business and Technology

NTCA MEMBERS	
John Prendergast, Attorney	Blooston, Mordkofsky, Dickens, Wash., DC
Gary Fleming, President	CHR Solutions, Dallas, TX
Darrell Dennis, Assistant Manager	XIT Rural Telephone Coop., Dalhart, TX
Jim Rasmussen, Board Member	Farmers Mutual Cooperative, Harlan, IA
Tom Conry, General Manager	Farmers Mutual Cooperative, Harlan, IA
David Schmidt, Manager	Heart of Iowa Comms. Coop., Union, IA
Terry McPeak, Board Member	DTC Communications, Alexandria, TN
Greg Whiteaker, Attorney	Bennet & Bennet, PLLC, Wash., D.C.
Ed Seagraves, Director	Clear Creek Mutual Tel. Co., Oregon City, OR
Wendel Myers, Assistant General Manager	Grand River Telephone Corp., Princeton, MO
Robert Lee Stanton, President	Rock Port Telephone, Rock Port, MO
Rich Coit, Executive Director	South Dakota Telecommunications, Pierre, SD
Gerald Smith, Director	Hardy Telecommunications, Baker, WV
Wayne Gassaway, General Manager	DTC Communications, Alexandria, TN
Randy Siler, Manager	West Wisconsin Telecom Coop., Downsville, WI
Ernie Peterson, General Manager	3 Rivers Wireless, Great Falls, Mont.
(Via conference call)	
Lynn Gunwall, Vice President	Penasco Valley Telephone, Artesia, NM
Daryl Carlson, General Manager	Webster-Calhoun Cooperative, Gowrie, Iowa
Mark Bentor, Manager	Midstate Communications, Kimball, SD
Mike Fugate, Manager	Kingdom Telephone Company, Auxvasse, MO